



**SERVING
WITH
PRIDE**



NATIONAL
HEADQUARTERS
4647 Forbes Boulevard
Lanham, Maryland
20706-4380
TELEPHONE: 301-459-9600
FAX: 301-459-7924
E-MAIL: amvets@amvets.org

Stewart M. Hickey
National Executive Director

September 9, 2013

Ruth Heilizer, Esq.
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

2013 SEP 12 AM 9:34
OFFICE OF THE
CLERK

MUR # 6754

Re: Complaint Against Velma Hart

Please accept this letter as a Complaint by AMVETS (American Veterans) against former employee Ms. Velma Hart, of , Upper Marlboro, Maryland 20774, for making federal PAC contributions using corporate funds.

AMVETS is a national veterans' service organization, Congressionally-chartered and tax-exempt under Section 501(c)(19) of the Internal Revenue Code. Ms. Velma Hart is a former employee of AMVETS, who held the position of National Finance Director, and was issued a corporate credit card. Ms. Hart's employment with AMVETS terminated on November 19, 2010.

In 2012, AMVETS engaged the firm of Tate & Tryon to conduct a review of specific elements of the AMVETS' financial statements for the 2010 fiscal year, and subsequently to examine corporate credit card charges by various AMVETS employees during the years 2006 - 2010. (Please see the full Tate & Tryon report, attached here as Exhibit A.) The examination revealed that Ms. Hart's credit card statements in particular contained a number of expenses lacking supporting documentation, as well as numerous instances of personal expenses charged to the corporate credit card by Ms. Hart. While AMVETS' records include copies of checks and deposit slips showing that Ms. Hart reimbursed AMVETS for some personal charges, in most instances no supporting documentation is included to tie the amounts of the reimbursement checks to specific expenditures identified as personal.

Of particular note, the examination revealed several federal PAC contributions made by Ms. Hart using her AMVETS corporate credit card. The internal AMVETS review found the following identified contributions to ASAE PAC on Ms. Hart's corporate credit card statements:

- 10/12/2005 - \$50
- 11/13/2006 - \$100
- 11/12/2008 - \$100

- 1444603445**

2